

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MARTINA ARCEAUX**

*Plaintiff,*

v.

**CITY OF HOUSTON**

*Defendant.*

§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 4:23-cv-904**

**TRIAL WITNESS LIST OF PLAINTIFF**

No.	WITNESS NAME	WITNESS ADDRESS
1.	Martina Arceneaux	11777 Katy Freeway, Suite 335 Houston TX 77079
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> Plaintiff.	
2.	Marcus Hardge	6707 Ezzard Charles Lane Houston, TX 77091
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i> He was Plaintiff's coworker. He can testify to the factual allegations of Plaintiff's claims. He can testify to Plaintiff's job duties and performance, his own experience and qualifications for the supervisor positions, which supervisor positions he applied for and was awarded, and his pay as a Field Supervisor.	
3.	Joseph Pierre	Unknown by Plaintiff
	<input checked="" type="checkbox"/> Live <input type="checkbox"/> Deposition <input checked="" type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i>	

	He was Plaintiff's supervisor and can testify to the factual allegations of Plaintiff's claims. He can testify to Plaintiff's job duties and performance and the discrimination and retaliation against Plaintiff.
4.	<input type="checkbox"/> Live <input type="checkbox"/> Deposition <input type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i>
5.	<input type="checkbox"/> Live <input type="checkbox"/> Deposition <input type="checkbox"/> Fact <input type="checkbox"/> Expert <input type="checkbox"/> Record Custodian <i>Brief description of witness capacity and testimonial topics:</i>

Respectfully submitted,

November 19, 2024

/s/ Sara Richey

Sara Richey  
11777 Katy Freeway, Suite 335  
Houston, TX 77079  
Tel. (713) 636-9931  
sara@thericheylawfirm.com